October 30, 2002

MEMORANDUM TO: James W. Andersen, Acting Chief, Section 2

Project Directorate I

Division of Licensing Project Management Office of Nuclear Reactor Regulation

FROM: Richard B. Ennis, Sr. Project Manager, Section 2

Project Directorate I

Division of Licensing Project Management Office of Nuclear Reactor Regulation

SUBJECT: MILLSTONE POWER STATION, UNIT NO. 2,

FACSIMILE TRANSMISSION, ISSUES TO BE DISCUSSED IN AN

/RA/

UPCOMING CONFERENCE CALL (TAC NO. MB6110)

The attached information was transmitted by facsimile on October 29, 2002, to Mr. Ravi Joshi of Dominion Nuclear Connecticut, Inc. (the licensee). This information was transmitted to facilitate a upcoming conference call in order to clarify the licensee's amendment request dated August 12, 2002, as supplemented October 21, 2002. The proposed amendment would revise Technical Specification (TS) 3.8.2.3, "Electrical Power Systems, D.C. Distribution - Operating," TS 3.8.2.4, "Electrical Power Systems, D.C. Distribution - Shutdown," and TS 3.8.2.5, "Electrical Power Systems, D.C. Distribution Systems (Turbine Battery) - Operating" to use standard technical specification terminology in order to provide enhanced readability and usability. The proposed amendment would also provide additional criteria for determining battery operability upon restoration from a recharge or equalizing charge. This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position.

Docket No. 50-336

Attachment: Issues for Discussion in Upcoming Telephone Conference

October 30, 2002

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Docket No. 50-336

Attachment: Issues for Discussion in Upcoming Telephone Conference

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ISSUES FOR DISCUSSION IN UPCOMING TELEPHONE CONFERENCE

REGARDING PROPOSED AMENDMENT TO TECHNICAL SPECIFICATIONS

ELECTRICAL POWER SYSTEMS - D.C. DISTRIBUTION

MILLSTONE POWER STATION, UNIT NO. 2

DOCKET NO 50-336

By letter dated August 12, 2002, as supplemented October 21, 2002, Dominion Nuclear Connecticut, Inc. (the licensee) submitted a proposed amendment to the Technical Specifications (TSs) for Millstone Power Station, Unit No. 2 (MP2). The proposed amendment would revise TS 3.8.2.3, "Electrical Power Systems, D.C. Distribution - Operating," TS 3.8.2.4, "Electrical Power Systems, D.C. Distribution - Shutdown," and TS 3.8.2.5, "Electrical Power Systems, D.C. Distribution Systems (Turbine Battery) - Operating" to use standard technical specification terminology in order to provide enhanced readability and usability. The proposed amendment would also provide additional criteria for determining battery operability upon restoration from a recharge or equalizing charge.

The Nuclear Regulatory Commission (NRC) staff has reviewed the information the licensee provided that supports the proposed TS changes and would like to discuss the following issues to clarify the submittal:

- 1) The proposed amendment adds new TS Tables 4.8-1 and 4.8-2 to reformat the existing battery cell parameter limits currently shown in TSs 4.8.2.3.2 and 4.8.2.5.2. Proposed Tables 4.8-1 and 4.8-2 indicate that verifying the electrolyte level in each connected cell is "not required." The current TSs also do not contain a surveillance requirement (SR) for verifying electrolyte level in the connected cells (although the current TSs do not explicitly state that the tests are not required). Section 8.5.4.2 of the MP2 Final Safety Analysis Report (FSAR) states that electrolyte level of each cell is checked periodically. For some of the other proposed changes, the submittal states that the changes are consistent with IEEE Standard 450-1980, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Large Lead Storage Batteries for Generating Stations and Substations." IEEE-450-1980, Section 4.3.1, recommends that electrolyte levels be checked at least once per month. The standard technical specifications (NUREG-1432, SR 3.8.6.3) include a requirement to verify electrolyte level in the connected cells every 31 days consistent with IEEE-450. The NUREG-1432 Bases for TS 3.8.6 state that the battery parameters satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii). Based on the MP2 FSAR, it appears that electrolyte level is checked, however, this parameter is not included as a TS requirement. Please discuss what provisions are currently provided in plant procedures to check electrolyte level in connected cells (i.e., consistent with FSAR) and discuss why an SR to verify electrolyte level in each connected cell is not required.
- 2) Notes (b) and (c) in proposed TS Tables 4.8-1 and 4.8-2 indicate that the float battery charging current is < 5 amps. Is this value consistent with the value of actual readings when the battery is on float? What are the battery capacities in ampere-hours?

3) Note (c) in proposed TS Tables 4.8-1 and 4.8-2 states that:

A battery charging current of < 5 amps when on float charge is acceptable for meeting specific gravity limits following a battery recharge, for a maximum of 7 days. When charging current is used to satisfy specific gravity requirements, specific gravity of each connected cell shall be measured prior to expiration of the 7 day allowance.

Attachment 1, page 6 of the submittal dated August 12, 2002, states that the 7 day frequency is consistent with IEEE-450-1980, as well as vendor recommendations. Please advise what section of IEEE-450-1980 is referenced when discussing the 7 day frequency.

- 4) With respect to the battery service test and performance test, please provide profiles that show the load in amps versus time for each step in the tests.
- 5) Please provide the expected sequence of battery loading for the first minute following a loss of AC power (i.e. loads versus time in seconds).